

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

KATHRYN KNOWLTON et. al.,

Plaintiff,

Case No. 20-CV- 01660

v.

CITY OF WAUWATOSA et. al.,

Defendants.

DECLARATION OF E. MILO SCHWAB

I, E. Milo Schwab, declare under penalty of perjury that the foregoing is true and accurate:

1. I am one of the attorneys responsible for the representation of Plaintiffs in this case. I am an attorney licensed to practice law in the State of Wisconsin and before the United States District Court for the Eastern District of Wisconsin.
2. Attached as Exhibit 1 is a true and correct copy of the transcript of Dennis McBride on 6/23/21.
3. Attached as Exhibit 2 is a true and correct copy of Dennis McBride Notes of 8/11/20.
4. Attached as Exhibit 3 is a true and correct copy of Dennis McBride email to Bill Walker.
5. Attached as Exhibit 4 is a true and correct copy of Dennis McBride Notes of 8/11/20.
6. Attached as Exhibit 5 is a true and correct copy of the Dennis McBride Notes of 9/7/20.
7. Attached as Exhibit 6 is a true and correct copy of the Barry Weber letter to Dennis McBride 9/10/20.
8. Attached as Exhibit 7 is a true and correct copy 9/11/20 Email from Paul E. Riegel.

9. Attached as Exhibit 8 is a true and correct copy of email re: Emergency Declaration Draft 9/17/20.
10. Attached as Exhibit 9 is a true and correct copy of the 9/17/20 Wauwatosa PD – Operational Documents.
11. Attached as Exhibit 10 is a true and correct copy of Luke Vetter’s email to Paul Knapp.
12. Attached as Exhibit 11 is a true and correct copy of the WPD Rules of Engagement
13. Attached as Exhibit 12 is a true and correct copy of the 093020 Correspondence to Operational Partners.
14. Attached as Exhibit 13 is a true and correct copy of the 10/6/20 Vetter approved operational plan.
15. Attached as Exhibit 14 is a true and correct copy of Shane Wrucke email 10/6/20.
16. Attached as Exhibit 15 is a true and correct copy of 10/6/20 Letter from Wauwatosa Dept. of Public Works.
17. Attached as Exhibit 16 is a true and correct copy of the Proclamation of Emergency 09/30/20.
18. Attached as Exhibit 17 is a true and correct copy of the 12/5/20 Dennis McBride OPED in Urban Milwaukee.
19. Attached as Exhibit 18 is a true and correct copy of Plaintiffs 1st RPD.
20. Attached as Exhibit 19 is a true and correct copy of Barry Weber Deposition Transcript of 5/13/21.
21. Attached as Exhibit 20 is a true and correct copy of the TPR Target List.

22. Attached as Exhibit 21 is a true and correct copy of the Email from Dominick Ratkowski to Christian Berges 10/06/20.
23. Attached as Exhibit 22 is a true and correct copy of the WPD High Value Target PowerPoint Presentation.
24. Attached as Exhibit 23 is a true and correct copy of WPD Arrest, Booked, and Released Citations.
25. Attached as Exhibit 24 is a true and correct copy of the Dominick Ratkowski Surveillance Files of the Ad Hoc Committee on Policing and Inequities.
26. Attached as Exhibit 25 is a true and correct copy of 071620 Email Introduction of the Ad Hoc Committee on Policing and Inequities.
27. Attached as Exhibit 26 is a true and correct copy of Dennis McBride 10/11/20 email to cite Christine Groppi.
28. Attached as Exhibit 27 is a true and correct copy of the Deposition of Jeffrey Farina 11/14/22.
29. Attached as Exhibit 28 is a true and correct copy of the WPD 2020 Annual Report.
30. Attached as Exhibit 29 is a true and correct copy of William Rivera Deposition Transcript 10/20/22.
31. Attached as Exhibit 30 is a true and correct copy of William Rivera Citation.
32. Attached as Exhibit 31 is a true and correct copy of 7/29/21 Deposition of Luke Vetter.
33. Attached as Exhibit 32 is a true and correct copy of Isaiah Baldwin Citation.
34. Attached as Exhibit 33 is a true and correct copy of Rosalind Roger Citation.
35. Attached as Exhibit 34 is a true and correct copy of 6/23/21 Deposition of Dominick Ratkowski.

36. Attached as Exhibit 35 is a true and correct copy of 7/9/20 letter to Wauwatosa Elected Officials.
37. Attached as Exhibit 36 is a true and correct copy of Deposition of Joseph Roy 7/26/21.
38. Attached as Exhibit 37 is a true and correct copy of Aidali Rivera Citation
39. Attached as Exhibit 38 is a true and correct copy WPD Police Reports Released by Roy on 1/7/21.
40. Attached as Exhibit 39 is a true and correct copy Plaintiffs document created in relation to Defendant's inaccurate citations in Summary Judgment Brief ECF No. 257.
41. For Exhibits 20, 22, 24, 30, 32, 33, 37, 38 I redacted the personal identifying information and also filed such exhibits in their unredacted form under seal.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted this 1st day of February,

/s/:Attorney E. Milo Schwab
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[Attorney for Plaintiffs](#)